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9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE CENTRAL DISTRICT OF CALIFORNIA
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13 **LANCE BOLAND, ET AL.,**

14 Plaintiffs,

15 v.

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17 **ROB BONTA, IN HIS OFFICIAL
CAPACITY AS ATTORNEY GENERAL OF
18 THE STATE OF CALIFORNIA, ET AL.,**

19 Defendants.
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Case No. 8:22-cv-01421-CJC-ADS

**DECLARATION OF SALVADOR
GONZALEZ IN SUPPORT OF
DEFENDANT'S FIRST CLOSING
BRIEF FOLLOWING
EVIDENTIARY HEARING ON
PLAINTIFFS' MOTION FOR A
PRELIMINARY INJUNCTION**

Courtroom: 9B
Judge: Hon. Cormac J. Carney
Trial Date: None set
Action Filed: August 1, 2022

1 I, Salvador Gonzalez, declare under penalty of perjury that:

2 1. I am over the age of 18 years and competent to make this declaration,
3 which is based on my personal knowledge.

4 2. I am a Special Agent Supervisor for the California Department of Justice
5 (“CA DOJ”), Bureau of Firearms (“BOF”).

6 3. I submitted a declaration in support of Defendant’s Opposition to
7 Plaintiffs’ Motion for a Preliminary Injunction, to which was attached my
8 curriculum vitae. ECF No. 30-2. I also testified as an expert on the Roster of
9 Certified Handguns (the “Roster”) and its requirements during the January 23, 2023
10 evidentiary hearing on Plaintiffs’ Motion. Prelim. Inj. Hr’g Day 1 Tr. (Jan. 23,
11 2023), ECF No. 54 (“PI Day 1 Tr.”), at 156-253.

12 4. At the evidentiary hearing, I testified there were 32 semiautomatic pistols
13 currently on the Roster with a chamber load indicator (“CLI”) and magazine
14 disconnect mechanism (“MDM”). PI Day 1 Tr. 179.

15 5. These 32 semiautomatic pistols are manufactured by four companies:
16 Kahr Arms, Sig Sauer, FMK Firearms, and Smith & Wesson. All four companies
17 added at least one of these semiautomatic pistols to the Roster before the
18 microstamping requirement took effect on May 17, 2013.

19 6. Of the 32 semiautomatic pistols with a CLI and MDM currently on the
20 Roster, 17 of these pistols were added to the Roster before May 17, 2013. Of those
21 17 pistols, 15 of them were added to the Roster after passing the drop safety and
22 firing tests in a certified laboratory pursuant to Penal Code sections 31910, 32010,
23 and 32015. The remaining two were added to the Roster as a “similar” by FMK
24 Firearms pursuant to Penal Code section 32030.

25 7. Of the 32 semiautomatic pistols with a CLI and MDM currently on the
26 Roster, the remaining 15 of these pistols were added to the Roster after May 17,
27 2013. All 15 were added to the Roster as a “similar” by Smith & Wesson pursuant
28 to Penal Code section 32030. They were added to the Roster in 2019 and 2022.

1 8. Before May 17, 2013, Sturm, Ruger, & Co. added to the Roster 15
2 semiautomatic pistols with a CLI and MDM. Of those 15 pistols, 11 of them were
3 added to the Roster after passing the drop safety and firing tests in a certified
4 laboratory pursuant to Penal Code sections 31910, 32010, and 32015, while the
5 remaining four were added as a “similar” pursuant to Penal Code section 32030.
6 However, none of these 15 pistols are currently on the Roster because Sturm,
7 Ruger, & Co. failed to pay the annual fee required under Penal Code section 32015
8 to keep these pistols on the Roster.

9 9. Before May 17, 2013, in addition to the pistols described in paragraphs 6
10 and 7, Sig Sauer and FMK Firearms also each added to the Roster one
11 semiautomatic pistol with a CLI and MDM after passing the drop safety and firing
12 tests in a certified laboratory pursuant to Penal Code sections 31910, 32010, and
13 32015. However, these pistols are not currently on the Roster because Sig Sauer
14 and FMK Firearms failed to pay the annual fee required under Penal Code section
15 32015 to keep these pistols on the Roster.

16 10. After May 17, 2013, Sig Sauer added to the Roster another
17 semiautomatic pistol with a CLI and MDM as a “similar” pursuant to Penal Code
18 section 32030. However, this pistol is not currently on the Roster because Sig
19 Sauer failed to pay the annual fee required under Penal Code section 32015 to keep
20 the pistol on the Roster.

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11. The below chart summarizes what is explained in paragraphs 5 through 10:

	Added to the Roster before May 17, 2013	Added to the Roster after May 17, 2013	Currently on the Roster
Tested semiautomatic pistols with CLI & MDM	28	0	15
Similar semiautomatic pistols with CLI & MDM	6	16	17

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on February 24, 2023, in SACRAMENTO, California.


SALVADOR GONZALEZ